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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	CASE NO. CR 15 – 0427 BLF
Plaintiff,)	STIPULATION AND [PROPOSED] ORDER;
v.)	
RAGINI VECHAM, <i>et al.</i> ,)	
Defendants.)	

WHEREAS, the United States and defendants RAGINI VECHAM a/k/a/ Ragini Vechman (“VECHAM”), KISHORE PALLAPOTHU a/k/a Krishna Kishore (“PALLAPOTHU”), SATYANARAYANA TOTA (“TOTA”), and RAMANA REDDY (“REDDY”) are scheduled to appear before the Court for a status hearing on Tuesday, May 24, 2016, in connection with the above-captioned matter;

WHEREAS, lead counsel for the United States is now scheduled to appear for a sentencing hearing in another case in the San Francisco Division of the Northern District of California that had originally been scheduled for Wednesday, May 18, 2016, at the time of the parties’ last appearance before this Court in this case, but, due to a subsequent change in the custodial status of the defendant in

1 the San Francisco case, was continued until Tuesday, May 24, 2016;

2 WHEREAS, defense counsel is continuing to review and evaluate discovery already provided by
3 the United States in this matter relative to preparing for a further status hearing and setting further dates
4 before the Court as well as engaging in discussions with the United States relative to the possibility of a
5 resolution short of trial;

6 WHEREAS, in light of the foregoing, counsel for the parties jointly agree and stipulate that a
7 continuance of this matter is appropriate in order to ensure effective preparation of counsel and
8 continuity of counsel, pursuant to 18 U.S.C. § 3161(h)(7), and that based on their respective calendars
9 and the period needed for the aforementioned discovery matters, an appropriate date for a status hearing
10 when counsel for all parties are next available is **Tuesday, July 12, 2016, at 9:00 a.m.,** a date and time
11 which is also available on this Court's calendar;

12 THEREFORE, the parties also mutually and jointly stipulate that the matter be continued for
13 defendants VECHAM, PALLAPOTHU, TOTA, and REDDY from May 24, 2016, until July 12, 2016,
14 and further jointly stipulate and agree that time should be excluded from May 24, 2016, up to and
15 including July 12, 2016.

16 All the parties agree that excluding time until July 12, 2016, is necessary, given the need to
17 maintain continuity of counsel. The parties also agree that failing to grant a continuance would deny
18 counsel for the defense the reasonable time necessary for effective preparation and continuity of
19 counsel, taking into account the exercise of due diligence. *See* 18 U.S.C. § 3161(h)(7). Finally, the
20 parties agree that the ends of justice served by excluding time from May 24, 2016, up to and including
21 until July 12, 2016, outweigh the best interest of the public and the defendant in a speedy
22 trial. *Id.* § 3161(h)(7).

23 **IT IS SO STIPULATED.**

24
25 DATED: May 22, 2016

/s/ _____
ETHAN BALOGH
Attorney for SATYANARAYANA TOTA

1 DATED: May 22, 2016

/s/
EDWIN PRATHER
Attorney for KISHORE PALLAPOTHU
a/k/a Krishna Kishore

5 DATED: May 22, 2016

/s/
NANCI CLARENCE
Attorney for RAGINI VECHAM
a/k/a/ Ragini Vechman

9 DATED: May 22, 2016

/s/
ISMAIL RAMSEY
Attorney for RAMANA REDDY

12 DATED: May 22, 2016

BRIAN J. STRETCH
United States Attorney

/s/
TIMOTHY J. LUCEY
Assistant United States Attorney

19 **IT IS SO ORDERED.**

21 **DATED: This 22nd day of May 2016**


HONORABLE BETH L. FREEMAN
United States District Court